## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND SOUTHERN DIVISION

HEATHER THOMPSON SHAI,	)
Plaintiff,	) )
v.	) Case No. WMN 02-CV-335
COMSYS INFORMATION TECHNOLOGY SERVICES, INC.,	) ) )
Defendant.	) ) )

## STIPULATION OF THE PARTIES REGARDING DISCOVERY

The parties, Heather Thompson Shai ("plaintiff") and Comsys Information Technology Services, Inc. ("defendant"), by and through their respective counsel, hereby stipulate and agree, subject to the approval of the Court, as follows:

- 1. The Court has before it the plaintiff's outstanding motion for reconsideration and for leave to amend and the defendant's outstanding motion for partial summary judgment.
- 2. To date, the parties have complied with all the deadlines in the January 8, 2003 Scheduling Order. The parties agree that the remaining deadlines regarding discovery as set forth in the January 8, 2003 Scheduling Order, should be enlarged because the parties do not know the full breath of the issues to be litigated, nor will the parties be able to develop the appropriate scope and direction of discovery until the motions are decided.
- 3. The parties agree that the discovery deadlines should be extended to allow them to adequately prepare their respective cases for trial.
- 4. The parties respectfully request that the Court extend all remaining discovery deadlines outlined in the January 8, 2003 Scheduling Order by seventy-five days from the date of the Court's

Order	deciding the outstanding motion	ons.		
			Respectfully submitted,	
COMS	YS INFO. TECH. SYSTEMS	, INC.	HEATHER THOMPSO	N SHAI
By:	_/s/ Jack L.B. Gohn (#02823)		_/s/ Mindy G. Farber (#0405 mfarber@erols.com R. Douglas Taylor, Jr. (# dtaylor@farbertaylor.co Mary E. Henry (#06195 mhenry@farbertaylor.co	#22542) <u>m</u> )
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		So Ordered. On this	day of	, 2003.

United States District Judge